

# Holland+Knight

Tel 202 955 3000  
Fax 202 955 5564

Holland & Knight LLP  
2099 Pennsylvania Avenue, N.W., Suite 100  
Washington, D.C. 20006  
www.hklaw.com

ORIGINAL

DOCKET FILE COPY ORIGINAL

February 3, 2005

DAVID A. O'CONNOR  
202-828-1889

Internet address:  
david.oconnor@hklaw.com

## VIA HAND DELIVERY

RECEIVED

FEB - 3 2005

Marlene H. Dortch, Esq., Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: *Amendment of Section 73.606(b), Table of Allotments, Television  
Broadcast Stations; and Section 73.622(b), Table of Allotments, Digital  
Broadcast Television Stations. (Mobile, Alabama)*  
MB Docket No. 04-281, RM-11041

Dear Ms. Dortch:

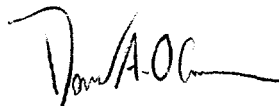
Transmitted herewith, on behalf of Paxson Communications Corporation ("Paxson"), are an original and four (4) copies of a minor change application offered in compliance with Paragraph 6 of the *Report and Order* in this proceeding. For the reasons set forth in the attached pleading, this filing is being submitted in paper form.

An extra copy of the filing is enclosed. Please date-stamp the extra copy and return it to the courier.

Should you have any questions about this matter, please contact the undersigned.

Respectfully submitted,

HOLLAND & KNIGHT LLP



David A. O'Connor  
Counsel for Paxson Communications Corporation

Enclosures

04-281-014

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**

FEB - 3 2005

Federal Communications Commission  
Office of Secretary

In the Matter of	)	
	)	
Amendment of Section 73.606(b),	)	MB Docket No. 04-281
Table of Allotments,	)	RM-11041
Television Broadcast Stations; and	)	
Section 73.622(b), Table of Allotments,	)	
Digital Broadcast Television Stations.	)	
(Mobile, Alabama)	)	

To: Office of the Secretary  
Attn: Chief, Video Division, Media Bureau

**SUBMISSION OF MINOR CHANGE**  
**APPLICATION FOR A CONSTRUCTION PERMIT**

Paxson Communications Corporation ("Paxson"), the proposed ultimate surviving applicant for a new commercial television station to operate on DTV Channel 18 serving Mobile, Alabama (the "Station"), by its attorneys, hereby submits the enclosed technical information in response to the *Report and Order* released on November 5, 2004 in the above-captioned proceeding ("Order").<sup>1</sup> The *Order* substituted DTV Channel 18 for NTSC Channel 61 at Mobile, Alabama and directed the submission by February 3, 2005 of a responsive minor change application for a construction permit.

In response to the *Order*, Paxson hereby submits an engineering amendment to the pending construction permit applications for Mobile (which all specified NTSC Channel 61) to specify DTV Channel 18. In making this submission, Paxson notes, however, that the procedure outlined in the *Order* is somewhat unusual and may raise some processing or procedural issues

---

<sup>1</sup> *Amendment of Section 73.606(b), Table of Allotments, Television Broadcast Stations; and Section 73.622(b), Table of Allotments, Digital Broadcast Television Stations. (Mobile, Alabama), Report and Order*, MB Docket No. 04-281, DA 04-3473 (MB rel. Nov. 5, 2004). ("Order").

in the future. In 1996 Television Capital Corporation of Mobile ("TCCM"), Fant Broadcast Development, L.L.C. ("Fant") and Marri Broadcasting, L.P. ("Marri") filed mutually exclusive applications for a construction permit to operate on NTSC Channel 61 at Mobile. In 1998, the three applicants resolved their mutual exclusivities and filed, on the statutory deadline of January 30, 1998,<sup>2</sup> a "Joint Approval of Universal Settlement Agreement" ("Settlement Agreement") seeking grant of the TCCM application and the dismissal of the applications submitted by Fant and Marri. Concurrently, TCCM and Paxson submitted an amendment to the surviving TCCM application seeking the substitution of Paxson as the surviving applicant.

Over the next seven years, joint amendments were filed to the settlement agreement and to the rulemaking petition requesting the channel change in Mobile. As of today, with the channel allocation and the channel change still pending, the Commission never has placed the proposed settlement or the proposed substitution of Paxson on Public Notice as required by the Commission's Rules and Regulations and the Communications Act of 1934, as amended (the "Act"), such that the Commission never has approved the proposed settlement or proposed substitution of Paxson as the ultimate surviving applicant. As such, Paxson is not an applicant at this time and technically is precluded from complying with the Commission's directive to submit the requested minor change construction permit application for the Station. Paxson simply is not a cut-off pending applicant for the Station as required by Section 309(l) of the Act.<sup>3</sup>

TCCM and Marri have reviewed and approved the substance of the engineering materials supporting this construction permit application but they have declined to participate in a joint filing such as the instant one, even though they are under an affirmative obligation in the Settlement Agreement to take all actions required to effect the settlement. Counsel to Fant has

---

<sup>2</sup> 47 U.S.C. § 309(l)(3).

<sup>3</sup> *Id.* § 309(l).

not responded to repeated requests to review and participate in this filing. Thus, Paxson is submitting this engineering unilaterally even though such an approach is fraught with potential danger. If the Commission does not approve either the proposed settlement among TCCM, Fant, and Marri or the proposed substitution of Paxson as the applicant, then the Mobile permit might be awarded pursuant to competitive bidding. In that case, the question is raised whether the three applicants (TCCM, Fant, and Marri) could participate in such competitive bidding, or if they could be deemed to have failed to prosecute their applications and effectively surrendered their rights by declining to amend their applications, or whether other parties also could participate in such competitive bidding. Furthermore, there could be a question of whether these applicants had effectively amended their applications to DTV Channel 18.

Because, pursuant to Section 309(l) of the Act, Paxson is not an applicant for the Station, because it does not have an application on file with the Commission, because it does not have an assigned file number for an application by which it could amend, and because it would be contrary to federal statute and the Commission's Rules for Paxson to supersede TCCM's application prior to a grant of the Settlement Agreement and approval of the substitution of Paxson as the surviving applicant, Paxson is responding to the Commission's directive in the *Order* by submitting the technical information in the paper form of a construction permit application, and to avoid the clear risks attendant to making an improper or unacceptable filing. To the extent necessary to allow the acceptance of this information and afford compliance with the *Order's* directive, Paxson hereby requests a waiver of the electronic filing obligations pursuant to Section 1.3 of the Commission's Rules.<sup>4</sup>

---

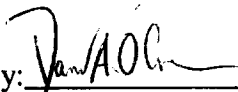
<sup>4</sup> 47 C.F.R. § 1.3; see *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972).

Paxson's submission of this technical information is without prejudice to all of its legal and equitable rights and remedies against TCCM, a company controlled by Elvin Feltner. At the present time, Paxson holds a judgment against TCCM, now in excess of \$1.6 million. It should be noted that TCCM's parent company, Television Capital Corporation also is the parent of corporate subsidiaries currently seeking settlements for its pending television construction permit applications in Gainesville, Florida; Lexington, Kentucky; and Richmond, Virginia.

Despite these procedural uncertainties and the uncertain status of TCCM, Paxson nevertheless submits the enclosed technical information, in the form of a minor change, to the applications for a construction permit for a new television station in Mobile, Alabama.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION

By: 

Charles R. Naftalin  
David A. O'Connor

*Its Attorneys*

Holland & Knight LLP  
2099 Pennsylvania Avenue, NW  
Suite 100  
Washington, DC 20006  
(202) 955-3000

February 3, 2005

# 2595001\_v1

Federal Communications Commission  
Washington, D.C. 20554Approved by OMB  
3060-0027 (September 2004)

FOR FCC USE ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR  
COMMERCIAL BROADCAST STATIONFOR COMMISSION USE ONLY  
FILE NO.  
-Read INSTRUCTIONS Before Filling Out Form

## Section I - General Information

1. Legal Name of the Applicant PAXSON COMMUNICATIONS CORPORATION	
Mailing Address 601 CLEARWATER PARK ROAD	
City WEST PALM BEACH	State or Country (if foreign address) FL
Telephone Number (include area code) 5616594122	ZIP Code 33401 -
FCC Registration Number: 960920WX-DT	E-Mail Address (if available) Facility ID Number 83740
2. Contact Representative (if other than Applicant) DAVID A. O'CONNOR	
Telephone Number (include area code) 2028281889	Firm or Company Name HOLLAND & KNIGHT LLP
E-Mail Address (if available) DAVID.OCONNOR@HKLAW.COM	
3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Other AMENDMEN	
4. Application Purpose <input type="radio"/> New station <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Change in licensed facility <input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application <input checked="" type="radio"/> Minor Amendment to pending application (a) File number of original construction permit: BPCT-19960920WX* <input type="checkbox"/> NA (b) Service Type: <input type="radio"/> AM <input type="radio"/> FM <input type="radio"/> TV <input checked="" type="radio"/> DTV (c) Community of License: City: MOBILE State: AL (d) Facility Type <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary If an amendment, submit as an Exhibit a listing by Section and Question Number the portions of the pending application that are being revised.	

Exhibit 1

Validate

Save

Menu

\*See also FCC File Nos. BPCT-19960722KQ and BPCT-19960725LB

**NOTE:** In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

## Section II - Legal

<p>1. <b>Certification.</b> Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.</p>	<p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>
<p>2. <b>Parties to the Application.</b></p> <p>a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <div style="display: flex; justify-content: space-between;"> <div data-bbox="189 670 908 883"> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.</p> </div> <div data-bbox="908 670 1466 904"> <p>(2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's <b>equity/debt plus</b> standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt).</p> </div> </div> <div style="border: 1px solid black; padding: 5px; margin: 10px 0; text-align: center;">Enter Parties/Owners Information</div> <p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in <div style="border: 1px solid black; padding: 2px; display: inline-block;">Exhibit 2</div></p>
<p>3. <b>Other Authorizations.</b> List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p>	<p><input type="checkbox"/> N/A <div style="border: 1px solid black; padding: 2px; display: inline-block; margin-top: 10px;">Exhibit 3</div></p>
<p>4. <b>Multiple Ownership.</b></p> <p>a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?</p> <p style="margin-left: 20px;">If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p> <p>b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules.</p> <p style="margin-left: 20px;">Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a).</p> <p style="margin-left: 20px;">All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p> <p>c. Applicant certifies that the proposed facility:</p> <p style="margin-left: 20px;">1. does not present an issue under the Commission's policies relating to media interests of</p>	<p><input type="radio"/> Yes <input checked="" type="radio"/> No <div style="border: 1px solid black; padding: 2px; display: inline-block; margin-top: 10px;">Exhibit 4</div></p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No <div style="border: 1px solid black; padding: 2px; display: inline-block; margin-top: 10px;">Exhibit 5</div></p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in</p>

immediate family members:	<b>Exhibit 6</b>
2. complies with the Commission's policies relating to future ownership interests; and	
3. complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.	
5. <b>Character Issues.</b> Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:	<input type="radio"/> Yes <input type="radio"/> No
a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or	See Explanation in <b>Exhibit 7</b>
b. any pending broadcast application in which character issues have been raised.	
6. <b>Adverse Findings.</b> Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.	<input type="radio"/> Yes <input type="radio"/> No See Explanation in <b>Exhibit 8</b>
7. <b>Alien Ownership and Control.</b> Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input type="radio"/> Yes <input type="radio"/> No See Explanation in <b>Exhibit 9</b>
8. <b>Program Service Certification.</b> Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.	<input type="radio"/> Yes <input type="radio"/> No
9. <b>Local Public Notice.</b> Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	<input type="radio"/> Yes <input type="radio"/> No
10. <b>Auction Authorization.</b> If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A <b>Exhibit 10</b>
An exhibit is required unless this question is inapplicable.	
11. <b>Anti-Drug Abuse Act Certification.</b> Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
12. <b>Equal Employment Opportunity (EEO).</b> If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing William L. Watson	Typed or Printed Title of Person Signing VICE PRESIDENT
Signature <i>William L. Watson</i>	Date 2/3/2005

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

<http://svanifoss2.fcc.gov/cgi-bin/ws.exe/prod/cdbs/forms/prod/storform.htm>

2/3/2005

REC'D 04:08PM FEB-03-05



**SECTION III-D - DTV ENGINEERING DATA**

**Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.**

**Certification Checklist:** A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:	
(a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this location as established in 47 C.F.R. Section 73.622.	<input checked="" type="radio"/> Yes <input type="radio"/> No
(c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.	<input type="radio"/> Yes <input checked="" type="radio"/> No
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. Applicant must submit the Exhibit called for in Item 13.	<input checked="" type="radio"/> Yes <input type="radio"/> No
3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.	<input checked="" type="radio"/> Yes <input type="radio"/> No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.	<input checked="" type="radio"/> Yes <input type="radio"/> No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require registration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.	<input checked="" type="radio"/> Yes <input type="radio"/> No

**SECTION III-D - DTV Engineering****TECHNICAL SPECIFICATIONS**

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1.	Channel Number: DTV 18 Analog TV, if any
2.	Zone: <input type="radio"/> I <input type="radio"/> II <input checked="" type="radio"/> III
3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 30 Minutes 36 Seconds 45 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 87 Minutes 38 Seconds 43 <input checked="" type="radio"/> West <input type="radio"/> East
4.	Antenna Structure Registration Number: 1212516 <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA

5.	Antenna Location Site Elevation Above Mean Sea Level:	45 meters																																																																																				
6.	Overall Tower Height Above Ground Level:	580 meters																																																																																				
7.	Height of Radiation Center Above Ground Level:	571 meters																																																																																				
8.	Height of Radiation Center Above Average Terrain :	574 meters																																																																																				
9.	Maximum Effective Radiated Power :	300 kW																																																																																				
10.	Antenna Specifications: <div style="margin-top: 10px;">           a. Manufacturer DIE    Model TFU-28GTH 6T120         </div> <div style="margin-top: 10px;">           b. Electrical Beam Tilt:            1 degrees    <input type="checkbox"/> Not Applicable         </div> <div style="margin-top: 10px;">           c. Mechanical Beam Tilt:            degrees toward azimuth            degrees True    <input checked="" type="checkbox"/> Not Applicable            Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.         </div> <div style="text-align: right; margin-top: 10px;">[Exhibit 40]</div> <div style="margin-top: 10px;">           d. Polarization:  <input checked="" type="radio"/> Horizontal    <input type="radio"/> Circular    <input type="radio"/> Elliptical         </div> <div style="margin-top: 10px;">           e. Directional Antenna Relative Field Values:    <input type="checkbox"/> Not applicable (Nondirectional)         </div> <div style="margin-top: 10px;">           [For a composite directional (not off-the-shelf) antenna, press the following button to fill in the relative field values subform.]            [Relative Field Values]         </div> <div style="text-align: center; margin-top: 20px;"> <b>10e. Directional Antenna Relative Field Values</b>             [Fill in this subform for a composite directional (not off-the-shelf) antenna, only.]         </div> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">           e. Directional Antenna Relative Field Values:            Rotation (Degrees): 0    <input type="checkbox"/> No Rotation         </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th><th>Degrees</th><th>Value</th></tr> </thead> <tbody> <tr><td>0</td><td>0.988</td><td>10</td><td>0.954</td><td>20</td><td>0.908</td><td>30</td><td>0.863</td><td>40</td><td>0.830</td><td>50</td><td>0.817</td></tr> <tr><td>60</td><td>0.828</td><td>70</td><td>0.859</td><td>80</td><td>0.903</td><td>90</td><td>0.950</td><td>100</td><td>0.986</td><td>110</td><td>1.000</td></tr> <tr><td>120</td><td>0.988</td><td>130</td><td>0.954</td><td>140</td><td>0.908</td><td>150</td><td>0.863</td><td>160</td><td>0.830</td><td>170</td><td>0.817</td></tr> <tr><td>180</td><td>0.828</td><td>190</td><td>0.859</td><td>200</td><td>0.903</td><td>210</td><td>0.950</td><td>220</td><td>0.986</td><td>230</td><td>1.000</td></tr> <tr><td>240</td><td>0.988</td><td>250</td><td>0.954</td><td>260</td><td>0.908</td><td>270</td><td>0.863</td><td>280</td><td>0.830</td><td>290</td><td>0.817</td></tr> <tr><td>300</td><td>0.828</td><td>310</td><td>0.859</td><td>320</td><td>0.903</td><td>330</td><td>0.950</td><td>340</td><td>0.986</td><td>350</td><td>1.000</td></tr> </tbody> </table> <div style="margin-top: 5px;">           Additional Azimuths         </div> <div style="text-align: center; margin-top: 10px;"> <u>Relative Field Polar Plot</u> </div>		Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	0	0.988	10	0.954	20	0.908	30	0.863	40	0.830	50	0.817	60	0.828	70	0.859	80	0.903	90	0.950	100	0.986	110	1.000	120	0.988	130	0.954	140	0.908	150	0.863	160	0.830	170	0.817	180	0.828	190	0.859	200	0.903	210	0.950	220	0.986	230	1.000	240	0.988	250	0.954	260	0.908	270	0.863	280	0.830	290	0.817	300	0.828	310	0.859	320	0.903	330	0.950	340	0.986	350	1.000
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value																																																																											
0	0.988	10	0.954	20	0.908	30	0.863	40	0.830	50	0.817																																																																											
60	0.828	70	0.859	80	0.903	90	0.950	100	0.986	110	1.000																																																																											
120	0.988	130	0.954	140	0.908	150	0.863	160	0.830	170	0.817																																																																											
180	0.828	190	0.859	200	0.903	210	0.950	220	0.986	230	1.000																																																																											
240	0.988	250	0.954	260	0.908	270	0.863	280	0.830	290	0.817																																																																											
300	0.828	310	0.859	320	0.903	330	0.950	340	0.986	350	1.000																																																																											

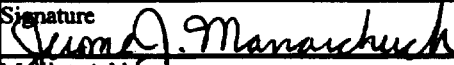
If a directional antenna is proposed, the requirements of 47 C.F.R. Sections 73.625(c) must be

[Exhibit 41]

	satisfied. Exhibit required.	
11.	Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if Certification Checklist items 1(a), (b), or (c) are answered "No".)	<input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 42]
	If No, attach as an Exhibit justification therefore, including a summary of any previously granted waivers.	
12.	If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefore. (Applicable only if Certification Checklist item 3 is answered "No".)	[Exhibit 43]
13.	<b>Environmental Protection Act.</b> Submit in an Exhibit the following: If Certification Checklist Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.  By checking "Yes" to Certification Checklist Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.  If Certification Checklist Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R Section 1.1311.	[Exhibit 44]
<b>PREPARERS CERTIFICATION ON SECTION III MUST BE COMPLETED AND SIGNED.</b>		

### SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name JEROME J. MANARCHUCK		Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT	
Signature 		Date 2/2/2005	
Mailing Address DUTREIL, LUNDIN & RACKLEY, INC. 201 FLETCHER AVE.			
City SARASOTA	State or Country (if foreign address) FL	Zip Code 34237 -	
Telephone Number (include area code) 9413296000	E-Mail Address (if available) JERRY@DLR.COM		

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**Exhibits****Exhibit 1****Description:** PURPOSE OF AMENDMENT

SECTION III OF THE APPLICATION AND THE ACCOMPANYING COMPREHENSIVE TECHNICAL EXHIBIT HAVE BEEN AMENDED TO REFLECT PROPOSED DIGITAL OPERATIONS ON DTV CHANNEL 18, AS OPPOSED TO ANALOG OPERATIONS ON TV CHANNEL 61.

**Attachment 1**

Description
Report and Order

**Exhibit 44****Description:** COMPREHENSIVE TECHNICAL EXHIBIT

TECHNICAL NARRATIVE  
FIGURE 1 ANTENNA DATA  
FIGURE 2 PREDICTED COVERAGE CONTOURS  
FIGURE 3 CDBS TV/DTV SEPARATION STUDY  
FIGURE 4 FM AND TV STATIONS WITHIN 16 KMS  
FIGURE 5 TECHNICAL SPECIFICATIONS

**Attachment 44**

Description
COMPREHENSIVE TECHNICAL EXHIBIT

## **ATTACHMENT 1**

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Amendment of Section 73.606(b), ) MB Docket No. 04-281  
Table of Allotments, ) RM-11041  
Television Broadcast Stations; and )  
Section 73.622(b), Table of Allotments )  
Digital Broadcast Television Stations. )  
(Mobile, Alabama) )

**REPORT AND ORDER**  
**(Proceeding Terminated)**

Adopted: October 28, 2004

Released: November 5, 2004

By the Chief, Video Division:

1. At the request of Paxson Communications Corporation and the dismissing applicants ("Applicants"), for a new commercial television to operate on channel 61 at Mobile, Alabama, the Commission has before it the Notice of Proposed Rule Making, 19 FCC Rcd 13835 (2004), proposing the substitution of DTV channel 18 for channel 61 at Mobile.<sup>1</sup> Paxson and TCCM filed comments supporting the channel substitution at Mobile, Alabama.

2. Initially, the Applicants requested the substitution of channel 50 for channel 61. However, after the petition was filed, the Commission adopted an *Order* reallocating the 698-746 MHz Spectrum Band (television channels 52-59) from use by television broadcasters.<sup>2</sup> In that *Reallocation Report and Order*, the Commission dismissed pending petitions for new NTSC channel allotments on channels 52-59, but provided an opportunity for parties to file a petition for rule making or amendment to their petitions to specify a new NTSC or a DTV channel on channels 2-51 or to propose a DTV allotment. The Applicants amended to their proposal seeking a new DTV channel allotment at Mobile.

3. We believe the public interest would be served by adopting the Applicants' proposal

<sup>1</sup> The Applicants include: Paxson Communications Corporation, Television Capital Corporation of Mobile ("TCCM"), Fant Broadcast Development, LLC and Marri Broadcasting, L.P. (together, Fant and Marri are the dismissing applicants for channel 61. In 1996, TCCM, Fant and Marri filed mutually exclusive applications for a construction permit to operate on NTSC channel 61 at Mobile. In 1998, the three applicants resolved mutual exclusivities and filed, on January 30, 1998, a "Joint Approval of Universal Settlement" seeking grant of the TCCM application and the dismissal of the applications submitted by Fant and Marri. Concurrently, TCCM and Paxson submitted an amendment to the surviving application seeking the substitution of Paxson as the surviving applicant.

<sup>2</sup> See *Reallocation and Service Rules for 698-746 MHz Spectrum Band (Television Channels 52-59)* ("Reallocation Report and Order"), Report and Order in GN Docket No. 01-74, 17 FCC Rcd 1022 (2002).

since it would provide the community of Mobile with a new DTV service. DTV channel 18 can be allotted to Mobile, Alabama, as proposed, in compliance with Sections 73.622(a) and 73.625(a) at coordinates 30-36-45 N. and 87-38-43 W. DTV channel 18 can be allotted with following specifications:

<u>State &amp; City</u>	<u>DTV Channel</u>	<u>DTV power (kW)</u>	<u>Antenna HAAT (m)</u>	<u>DTV Service Pop. (thous.)</u>
AL Mobile	18	396	552	1115

4. Accordingly, pursuant to the authority contained in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED, That effective December 20, 2004, the TV Table of Allotments, Section 73.606(b) of the Commission's Rules, IS AMENDED, with respect to the community listed below, to read as follows:

<u>City</u>	<u>Channel No.</u>
Mobile, Alabama	5+, 10+, 15+ 21+, *31, *42

5. IT IS FURTHER ORDERED, That effective December 20, 2004, the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, IS AMENDED, with respect to the community listed below, to read as follows:

<u>City</u>	<u>Channel No.</u>
Mobile, Alabama	9, 18, 20, 27, *41, 47

6. IT IS FURTHER ORDERED, That within 45 days of the effective date of this Order, Paxson Communications Corporation shall submit to the Commission a minor change application for a construction permit (FCC Form 301) specifying DTV Channel 18 in lieu of TV Channel 61 at Mobile.

7. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

8. For further information concerning this proceeding, contact Pam Blumenthal, Media Bureau, (202) 418-1600.

FEDERAL COMMUNICATIONS COMMISSION

Barbara A. Kreisman  
Chief, Video Division  
Media Bureau



**ATTACHMENT 44**  
**COMPREHENSIVE TECHNICAL**  
**EXHIBIT**

TECHNICAL EXHIBIT  
APPLICATION FOR DTV CONSTRUCTION PERMIT  
NEW DTV STATION  
FACILITY ID: 158818  
MOBILE, ALABAMA  
CH 18 300 KW (MAX-DA) 574 M

Technical Narrative

This Technical Exhibit supports an application for DTV construction permit for a new digital operation on channel 18 at Mobile, Alabama. In MB Docket No. 04-281, RM-11041 the FCC allotted DTV channel 18 to Mobile, Alabama and ordered that within 45 days of the effective date (December 20, 2004) a minor change be submitted specifying DTV Channel 18 at Mobile. Therefore, in response to the Report and Order, this application has been prepared to propose a new DTV operation on channel 18 with a maximum directional effective radiated power (ERP) of 300 kW and an antenna radiation center height above average terrain (HAAT) of 574 meters.

Freeze Compliance

This application can be accepted for filing as it does not request a change which is considered "frozen" by the FCC's Public Notice (DA 04-2446) released August 3, 2004, *Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes*.

Proposed Operation

It is proposed to operate on DTV channel 18 from the allotment site, N 30°36'45" W 87°38'43". Specifically, it is proposed to top-mount a Dielectric TFU-28GTH 6T120 directional antenna and operate with a maximum directional ERP of 300 kW and an HAAT of 574 meters. The proposed facilities (ERP 300 kW/HAAT 574 meters) comply with the nominal maximum permitted pursuant to Section 73.622(f)(8)(i). The antenna structure registration number (ASRN) for the existing tower is 1212516.

Response to Certification Checklist Question 1(c)

It is noted that question 1(c) of the checklist certification has been answered "no" due to the fact the proposed HAAT is 22 meters greater than the reference HAAT allotted in MB Docket No. 04-281, RM-11041. However, the ERP has been reduced such that the proposed facilities will not exceed the allotted facilities and will therefore comply with the FCC's Public Notice (DA 04-2446) released August 3, 2004, *Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes*. The contours for both the proposed and allotted facilities are shown in Figure 2.

Response to Paragraph 10 - Directional Antenna Data

Figure 1 provides graphs of the horizontal and vertical relative field patterns for the proposed Dielectric TFU-28GTH 6T120 antenna.

Response to Paragraph 12 - City Coverage

Figure 2 is a map showing the DTV predicted coverage contours. The map provides the predicted 41 dBu f(50,90) noise-limited contour and 48 dBu f(50,90) city grade contour. The extent of the contours has been calculated using the normal FCC prediction method and a 3-second digitized terrain database. The Mobile city limits were derived from information contained in the 2000 U.S. Census for Alabama. As shown, the 48 dBu contour encompasses the entire city limits of Mobile.

In addition, the 41 dBu noise-limited contour for the Mobile allotment is also shown on the map. As can be seen, the proposed 41 dBu (noise-limited) contour is fully encompassed by the 41 dBu contour of the allotment, and therefore there is no increase in service area.

NTSC/DTV/Class A Allocation Considerations

Figure 3 is a DTV channel 18 separation study toward other NTSC and DTV allotments based on a 50 kilometer "buffer".

Although the separation requirements are only applicable to new DTV allotments, they can be used as an indication of which stations have the potential of receiving interference from the proposed channel 18 DTV operation.

An interference analysis has been conducted using the procedures outlined in the FCC's OET-69 bulletin, which demonstrates that the proposal complies with the interference protection provisions of Section 73.623(c)(2).<sup>1</sup> Interference calculations for the proposed operation are summarized below with respect to all authorized NTSC, DTV, and Class A facilities.

Station	Facility	Ch.	City	State	FCC Service Population	Proposed Interference Population	% of Baseline
WPMI-TV	APP	15	MOBILE	AL	--	--	None
WPMI-TV	LIC	15	MOBILE	AL	--	--	None
WEAR-DT	PLN	17	PENSACOLA	FL	1,108,105	1072	0.097
WEAR-TV	CP	17	PENSACOLA	FL	--	--	None
WDBB	CP	18	BESSEMER	AL	1,305,190	837	0.064
WDBB-DT	PLN	18	BESSEMER	AL	1,305,190	338	0.026
WDHN	LIC	18	DOTHAN	AL	291,249	2,820	0.968
WBXN-CA	LIC	18	NEW ORLEANS	LA	--	--	None
WMAU-DT	PLN	18	BUDE	MS	223,709	31	0.014
WMAU-TV	CP	18	BUDE	MS	223,709	3,145	1.406
WIIQ	CP	19	DEMOPOLIS	AL	--	--	None
WIIQ-DT	PLN	19	DEMOPOLIS	AL	--	--	None
WMBB	CP	19	PANAMA CITY	FL	--	--	None
WMBB-DT	PLN	19	PANAMA CITY	FL	--	--	None
WMAH-TV	LIC	19	BILOXI	MS	--	--	None
WMPV-TV	CP	21	MOBILE	AL	--	--	None
WMPV-TV	LIC	21	MOBILE	AL	--	--	None
WXXV-TV	LIC	25	GULFPORT	MS	--	--	None

The study indicated that the proposed operation will not be involved in prohibited contour overlap to any Class A stations. It is also apparent that the proposal on channel 18

<sup>1</sup> The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. A Sun based processor computer system was employed.

complies with the FCC's interference standards towards all authorized NTSC and DTV assignments.

Objectionable Interference

There are no known authorized full service AM stations within 5 kilometers (3 miles) of the proposed transmitter site. Figure 4 is a list of authorized full service NTSC, DTV, & FM stations within 16 kilometers (10 miles) of the proposed DTV site. Although no adverse electromagnetic impact is expected, the applicant recognizes its responsibility to correct problems, which are a result of its proposed DTV operation.

The proposed transmitter site is more than 1,300 kilometers from the Canadian border. The proposed transmitter site is more than 1000 kilometers from the US/Mexican border area. The closest FCC monitoring is at Power Springs, Georgia, located 454 kilometers to the northeast. The proposed DTV site is outside the National Radio Quiet Zone (VA/WVA), the closest point being more than 1,000 kilometers to the northeast. The closest point of the Table Mountain Radio Quiet Zone (CO) is more than 1,900 kilometers to the northwest. The closest radio astronomy site operating on TV channel 37 is at Green Bank, WV, located approximately 1125 kilometers to the northeast. These separations are sufficient to not be a concern for coordination purposes.

Response to Paragraph 13 - Environmental Protection Act

The proposed facility has been evaluated in terms of potential radiofrequency electromagnetic field exposure at ground level in accordance with OET Bulletin No. 65, Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields<sup>2</sup>. The power density at the base of the tower was calculated using the appropriate procedures contained in the Bulletin.

The proposed antenna will be top-mounted on an existing tower. The antenna center of radiation is located 571

meters above ground level. The calculated power density at 2 meters above ground level (AGL) was calculated using the appropriate equation contained in the Bulletin. A graph of the vertical plane relative field pattern proposed antenna is shown in Figure 1. The maximum vertical relative field value towards the tower base (-60 to -90 elevation) is less than 0.1. Therefore, using a "worst-case" vertical relative field value of 0.1, the calculated power density at 2 meters above the ground is 0.0003 milliwatts per square centimeter ( $\text{mW}/\text{cm}^2$ ), which is 0.09% of the Commission's recommended limit of  $0.33 \text{ mW}/\text{cm}^2$  for channel 18, applicable to uncontrolled exposure areas. Therefore, based on the responsibility threshold of 5%, the proposal will comply with the RF emission rules.

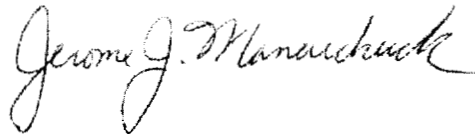
The site is appropriately marked with RFR warning signs. Furthermore, as this is a multi-user site procedures are in place in the event that workers or other authorized personal climb the tower to ensure that appropriate measure will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure

Finally, it is noted that this technical exhibit only addresses the potential for radio frequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already has been provided to the FCC by the tower owner as part of the tower registration process.

---

<sup>2</sup> OET Bulletin 65, Second Edition 97-01, August, 1997.

If there are questions concerning the technical portion of this application, please contact the office of the undersigned.



Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, California 34237  
(941) 329-6000  
JERRY@DLR.COM

February 2, 2005

# Dielectric

Date	14 Dec 2004	Channel	18
Call Letters	NEW		
Location	Mobile		
Customer	Paxson		
Antenna Type	TFU-28GTH 6T120		

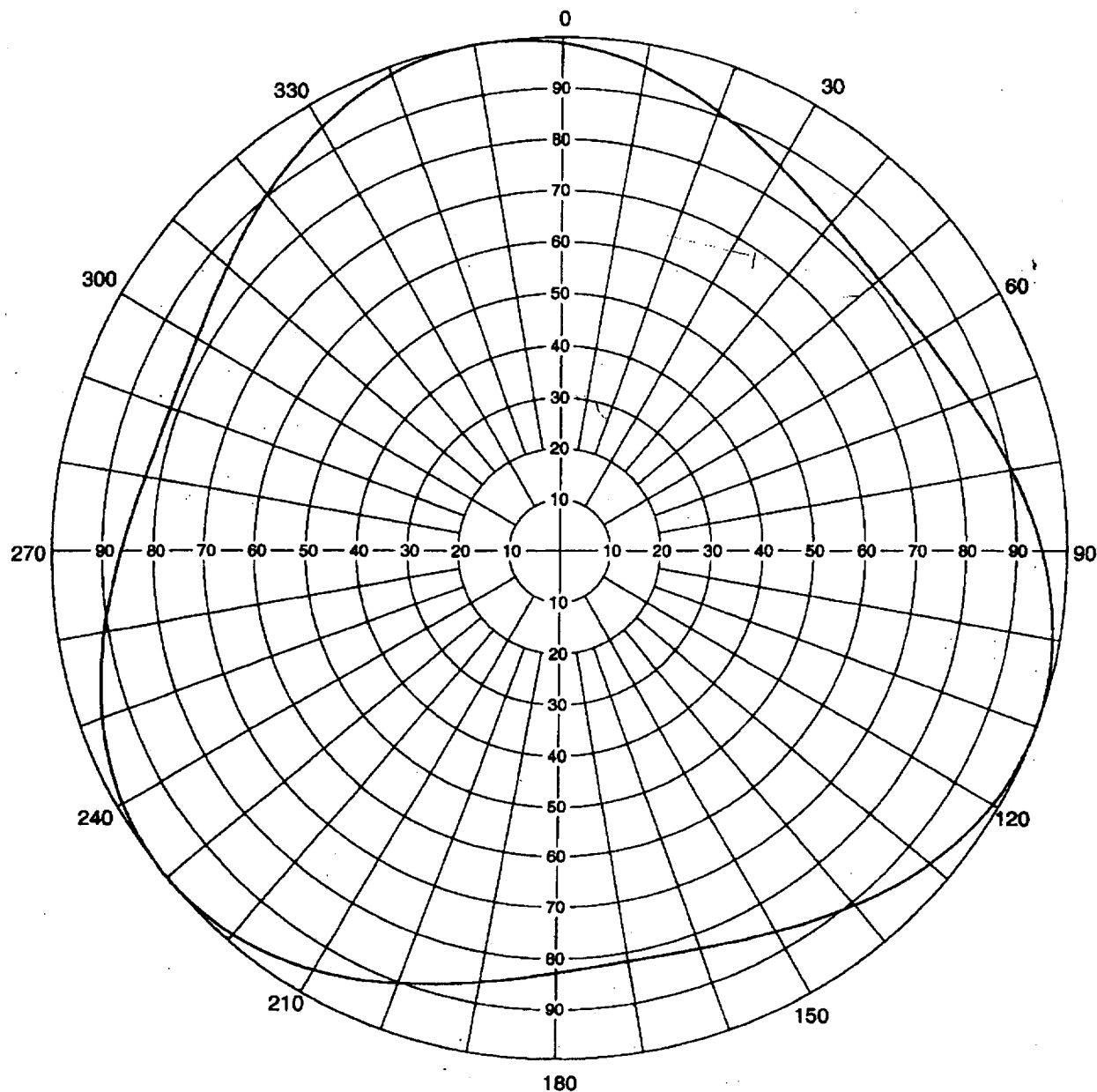
## AZIMUTH PATTERN

Gain  
Calculated / Measured

1.20 (0.79 dB)  
Calculated

Frequency  
Drawing #

497 MHz  
TFU-6T120





# Dielectric

Date 14 Dec 2004  
 Call Letters NEW Channel 18  
 Location MOBILE  
 Customer PAXSON  
 Antenna Type TFU-28GTH 6T120

## TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # TFU-6T120

Angle	Field	ERP (kW)	ERP (dBk)
0	0.988	292.8	24.67
10	0.954	273.0	24.36
20	0.908	247.3	23.93
30	0.863	223.4	23.49
40	0.830	206.7	23.15
50	0.817	200.2	23.02
60	0.828	205.7	23.13
70	0.859	221.4	23.45
80	0.903	244.6	23.88
90	0.950	270.8	24.33
100	0.986	291.7	24.65
110	1.000	300.0	24.77
120	0.988	292.8	24.67
130	0.954	273.0	24.36
140	0.908	247.3	23.93
150	0.863	223.4	23.49
160	0.830	206.7	23.15
170	0.817	200.2	23.02
180	0.828	205.7	23.13
190	0.859	221.4	23.45
200	0.903	244.6	23.88
210	0.950	270.8	24.33
220	0.986	291.7	24.65
230	1.000	300.0	24.77
240	0.988	292.8	24.67
250	0.954	273.0	24.36
260	0.908	247.3	23.93
270	0.863	223.4	23.49
280	0.830	206.7	23.15
290	0.817	200.2	23.02
300	0.828	205.7	23.13
310	0.859	221.4	23.45
320	0.903	244.6	23.88
330	0.950	270.8	24.33
340	0.986	291.7	24.65
350	1.000	300.0	24.77

### Maxima

Angle	Field	ERP (kW)	ERP (dBk)
0	0.988	292.8	24.67
111	1.000	300.0	24.77
231	1.000	300.0	24.77
351	1.000	300.0	24.77

### Minima

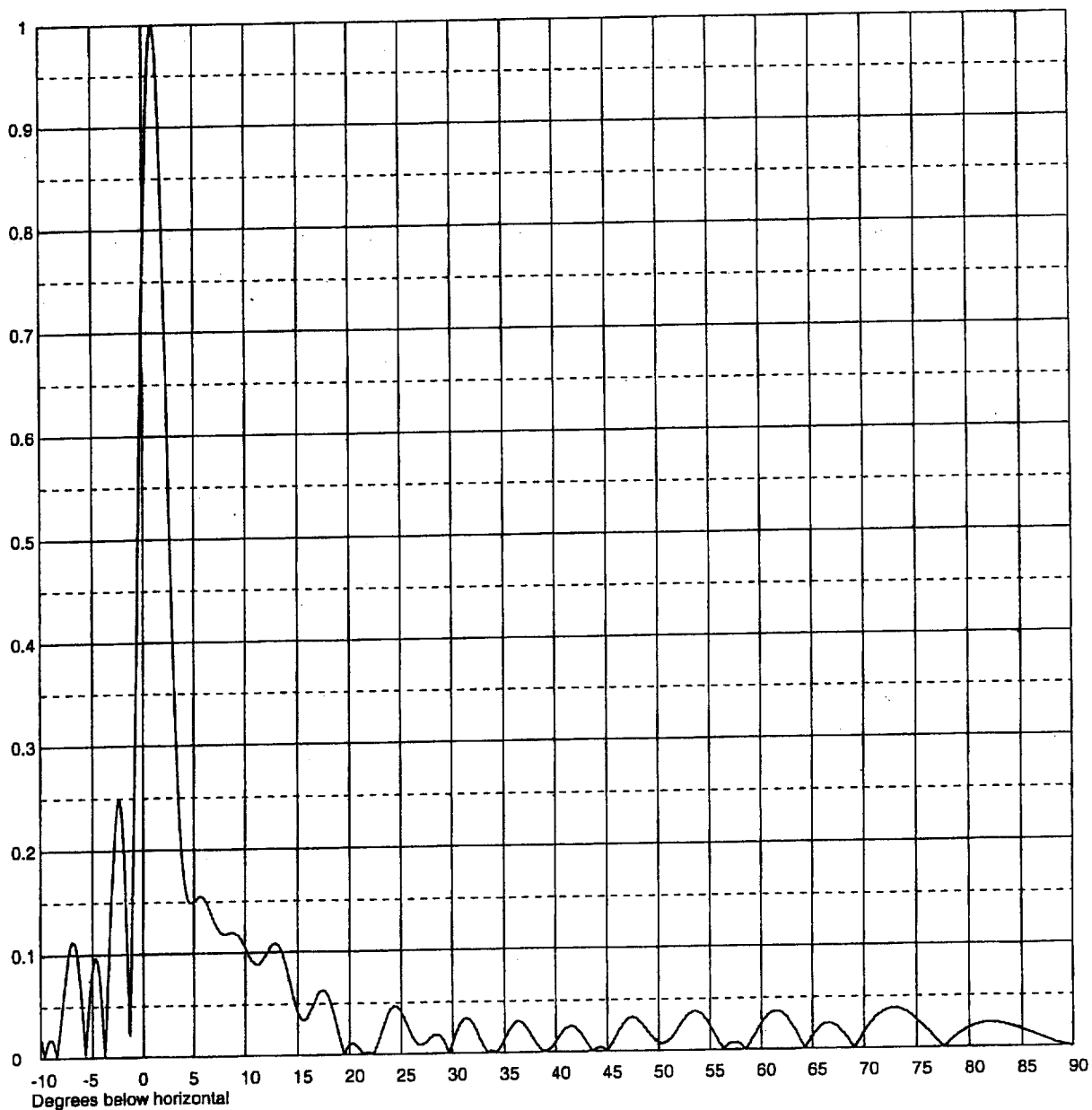
Angle	Field	ERP (kW)	ERP (dBk)
51	0.817	200.2	23.02
171	0.817	200.2	23.02
291	0.817	200.2	23.02

# Dielectric

Date	14 Dec 2004	
Call Letters	NEW	Channel 18
Location	MOBILE	
Customer	PAXSON	
Antenna Type	TFU-28GTH 6T120	

## ELEVATION PATTERN

RMS Gain at Main Lobe	24.0 (13.80 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	13.6 (11.34 dB)	Frequency	497.00 MHz
Calculated / Measured	Calculated	Drawing #	28G240100-90



# Dielectric

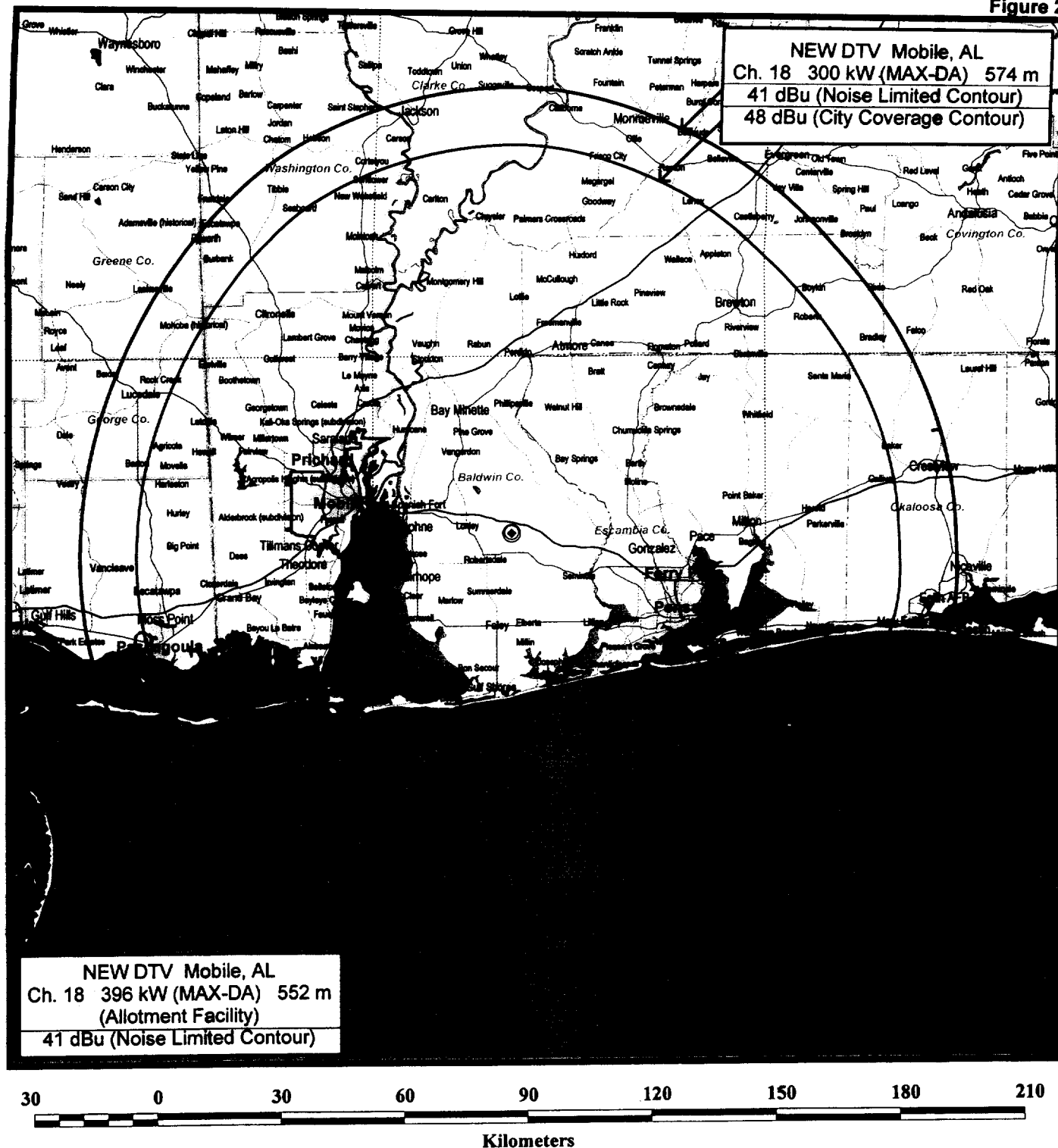
Date 14 Dec 2004  
 Call Letters NEW Channel 18  
 Location MOBILE  
 Customer PAXSON  
 Antenna Type TFU-28GTH 6T120

## TABULATION OF ELEVATION PATTERN

Elevation Pattern Drawing # 28G240100-90

Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field	Angle	Field
-10.0	0.024	2.4	0.616	10.6	0.093	30.5	0.023	51.0	0.010	71.5	0.033
-9.5	0.007	2.6	0.536	10.8	0.091	31.0	0.032	51.5	0.016	72.0	0.037
-9.0	0.018	2.8	0.460	11.0	0.089	31.5	0.033	52.0	0.023	72.5	0.039
-8.5	0.001	3.0	0.391	11.5	0.091	32.0	0.028	52.5	0.030	73.0	0.039
-8.0	0.040	3.2	0.329	12.0	0.099	32.5	0.017	53.0	0.036	73.5	0.038
-7.5	0.086	3.4	0.277	12.5	0.107	33.0	0.007	53.5	0.038	74.0	0.035
-7.0	0.112	3.6	0.235	13.0	0.108	33.5	0.001	54.0	0.036	74.5	0.032
-6.5	0.098	3.8	0.202	13.5	0.100	34.0	0.002	54.5	0.031	75.0	0.027
-6.0	0.046	4.0	0.178	14.0	0.082	34.5	0.003	55.0	0.024	75.5	0.022
-5.5	0.026	4.2	0.163	14.5	0.060	35.0	0.012	55.5	0.015	76.0	0.017
-5.0	0.084	4.4	0.153	15.0	0.042	35.5	0.022	56.0	0.006	76.5	0.011
-4.5	0.093	4.6	0.149	15.5	0.034	36.0	0.028	56.5	0.002	77.0	0.006
-4.0	0.039	4.8	0.149	16.0	0.038	36.5	0.030	57.0	0.006	77.5	0.001
-3.5	0.066	5.0	0.150	16.5	0.049	37.0	0.026	57.5	0.007	78.0	0.004
-3.0	0.179	5.2	0.152	17.0	0.060	37.5	0.018	58.0	0.005	78.5	0.009
-2.8	0.215	5.4	0.154	17.5	0.063	38.0	0.009	58.5	0.000	79.0	0.013
-2.6	0.239	5.6	0.155	18.0	0.056	38.5	0.003	59.0	0.008	79.5	0.016
-2.4	0.249	5.8	0.155	18.5	0.039	39.0	0.001	59.5	0.016	80.0	0.019
-2.2	0.241	6.0	0.153	19.0	0.018	39.5	0.004	60.0	0.025	80.5	0.021
-2.0	0.216	6.2	0.150	19.5	0.000	40.0	0.010	60.5	0.031	81.0	0.022
-1.8	0.171	6.4	0.145	20.0	0.010	40.5	0.017	61.0	0.036	81.5	0.023
-1.6	0.106	6.6	0.140	20.5	0.010	41.0	0.023	61.5	0.037	82.0	0.023
-1.4	0.025	6.8	0.135	21.0	0.005	41.5	0.025	62.0	0.036	82.5	0.023
-1.2	0.072	7.0	0.130	21.5	0.001	42.0	0.022	62.5	0.031	83.0	0.022
-1.0	0.181	7.2	0.126	22.0	0.001	42.5	0.016	63.0	0.024	83.5	0.021
-0.8	0.298	7.4	0.123	22.5	0.006	43.0	0.008	63.5	0.015	84.0	0.020
-0.6	0.419	7.6	0.120	23.0	0.019	43.5	0.001	64.0	0.005	84.5	0.018
-0.4	0.538	7.8	0.119	23.5	0.033	44.0	0.003	64.5	0.004	85.0	0.016
-0.2	0.651	8.0	0.118	24.0	0.044	44.5	0.004	65.0	0.012	85.5	0.015
0.0	0.753	8.2	0.118	24.5	0.047	45.0	0.001	65.5	0.018	86.0	0.013
0.2	0.842	8.4	0.119	25.0	0.041	45.5	0.008	66.0	0.023	86.5	0.011
0.4	0.912	8.6	0.119	25.5	0.030	46.0	0.017	66.5	0.024	87.0	0.009
0.6	0.963	8.8	0.120	26.0	0.018	46.5	0.026	67.0	0.023	87.5	0.007
0.8	0.992	9.0	0.119	26.5	0.011	47.0	0.031	67.5	0.020	88.0	0.005
1.0	1.000	9.2	0.118	27.0	0.009	47.5	0.033	68.0	0.015	88.5	0.003
1.2	0.987	9.4	0.116	27.5	0.012	48.0	0.030	68.5	0.008	89.0	0.002
1.4	0.956	9.6	0.113	28.0	0.016	48.5	0.025	69.0	0.001	89.5	0.001
1.6	0.907	9.8	0.109	28.5	0.018	49.0	0.018	69.5	0.007	90.0	0.000
1.8	0.846	10.0	0.105	29.0	0.014	49.5	0.012	70.0	0.015		
2.0	0.774	10.2	0.101	29.5	0.004	50.0	0.008	70.5	0.022		
2.2	0.696	10.4	0.097	30.0	0.009	50.5	0.007	71.0	0.029		

**NEW DTV Mobile, AL**  
**Ch. 18 300 kW (MAX-DA) 574 m**  
**41 dBu (Noise Limited Contour)**  
**48 dBu (City Coverage Contour)**



## PREDICTED COVERAGE CONTOURS

**NEW DTV STATION  
MOBILE, ALABAMA  
CH 18 300 KW (MAX-DA) 574 m**

du Treil, Lundin &amp; Rackley, Inc. Sarasota, FL

Figure 3

## CDBS TV/DTV SEPARATION STUDY

Job Title:  
 Channel: 18  
 Class:  
 Type: DT

Separation Buffer: 50 km  
 Coordinates: 30-36-45 87-38-43  
 Zone: III

Call Id	City St	File Status Num	Channel Zone	ERP HAAT	DA Id	Latitude Longitude	Bear	Dist. (km)	Req. min max
WPMI-T 11906	MOBILE AL LIC C	BLCT 19820308KEIII	15(+) 5000.000 D 30-37-35 087-38-50	521 18505			353.1	1.6 22.55	24.1 96.6 Clear
WPMI-T 11906	MOBILE AL APP C	BPCT 20040106AAIII	15(+) 5000.000 D 30-36-40 087-36-27	563 68280			92.4	3.6 20.47	24.1 96.6 Clear
WEAR-T 71363	PENSACOLA FL STA C	BDSTA 20021021AD	17( ) 8.300 D 30-36-45 087-38-43	102.8 44863			90.0	0.0 24.00	24.0 110.0 Clear
WEAR-T 71363	PENSACOLA FL CP C	BPCDT 19991028AEIII	17( ) 1000.000 N 30-36-45 087-38-43	579 39646			90.0	0.0 24.00	24.0 110.0 Clear
DWEART	PENSACOLA FL DTV		17( ) 1000.000 D 30-37-38 087-37-31	372			49.5	2.5 21.48	24.0 110.0 Clear
NEW 158818	MOBILE AL GRA C	BPRM 20000714ABIII	18(Z) 396.000 D 30-36-45 087-38-43	552 65214			90.0	0.0 223.70	223.7 223.7 Short
WDHN 43846	DOTHAN AL LIC C	BLCT 2038	18(Z) 1070.000 N 31-14-30 085-18-48	223			71.9	233.5 11.06	244.6 244.6 Short <sup>1</sup>
WBXN-C 70419	NEW ORLEANS LA LIC C	BLTTA 20040525AG	18(+) 5.000 D 29-55-12 090-01-29	20425			252.0	241.5 3.10	0.0 0.0 Class A
WMAH-T 43197	BILOXI MS LIC C	BMLET 20030103AAIII	19(+) 1593.000 D 30-45-18 088-56-44	476.3 64495			277.6	125.6 19.59	12.0 106.0 Clear
WMPV-T 60827	MOBILE AL LIC C	BLCT 19860103KFIII	21(+) 4370.000 D 30-35-18 087-33-16	436 18235			107.2	9.1 14.99	24.1 96.6 Close
WMPV-T 60827	MOBILE AL CP C	BPCT 20010905AAIII	21(+) 3083.000 D 30-35-18 087-33-16	436 42006			107.2	9.1 14.99	24.1 96.6 Close
WXXV-T 53517	GULFPORT MS LIC C	BLCT 19870224KGIII	25(-) 2240.000 D 30-44-48 089-03-30	488 19236			276.7	136.2 39.62	24.1 96.6 Clear

<sup>1</sup> Protection provided using OET-69 studies, see technical narrative.

**du Treil, Lundin, and Rackley**

Coordinates: 30-36-45 87-38-43 Frequency Range: 200-300

Range: 16

**FM Stations Within 16 kilometers**

Rec Type	Fac Id	Call	Status	Chan	Svc Class	Class	City	St	DA	Latitude	Longitude	ERP (kW)	HAAT (m)	RCAMSL (m)	Bear	Dist. (km)
C	2540	WBLX-F	LIC	225	FM	C	MOBILE	AL	N	30-37-35	087-38-50	100.000	474.0	508.0	353.1	1.6
C	53145	WKSJ-F	LIC	235	FM	C	MOBILE	AL	N	30-37-35	087-38-50	100.000	474.0	508.0	353.1	1.6
C	12143	WJLQ	LIC	264	FM	C	PENSACOLA	FL		30-37-35	087-38-50	100.000	474.0	508.0	353.1	1.6
C	8680	WYOK	LIC	281	FM	C	ATMORE	AL		30-37-35	087-38-50	100.000	474.0	508.0	353.1	1.6
C	52230	WPCS	LIC	208	FM	C	PENSACOLA	FL		30-35-18	087-33-16	100.000	405.0	429.0	107.2	9.1
C	73256	WMEZ	LIC	231	FM	C0	PENSACOLA	FL		30-35-18	087-33-16	100.000	405.0	437.0	107.2	9.1
C	61243	WTKX-F	LIC	268	FM	C	PENSACOLA	FL	N	30-35-18	087-33-16	100.000	405.0	437.0	107.2	9.1
C	32946	WXBM-F	LIC	274	FM	C	MILTON	FL		30-35-18	087-33-16	100.000	405.0	437.0	107.2	9.1
C	52230	WPCS	CP	208	FM	C0	PENSACOLA	FL	N	30-35-16	087-33-13	95.000	414.0	439.0	107.4	9.2
C	63931	WYCL	CP	297	FM	C0	PENSACOLA	FL	N	30-35-16	087-33-13	100.000	417.0	441.0	107.4	9.2

**du Treil, Lundin, and Rackley**

Coordinates: 30-36-45 87-38-43 Channel Range: 2-69

Range: 16

**TVs Within 16 kilometers**

Rec Type	Facility Id	Call	Status	Chan	Svc Class	Class	City	St	DA	Latitude	Longitude	ERP (kW)	HAAT (m)	RCAMSL (m)	Bearing	Dist. (km)
C	158818	NEW	GRA	18	DM		MOBILE	AL	D	30-36-45	087-38-43	396.000	552	584	0	0
C	71363	WEAR-T	STA	17	DS		PENSACOLA	FL	D	30-36-45	087-38-43	8.300	102.8	136	0	0
C	71363	WEAR-T	CP	17	DT		PENSACOLA	FL	N	30-36-45	087-38-43	1000.00	579	612	0	0
C	71363	WEAR-T	LIC	3	TV		PENSACOLA	FL	N	30-36-45	087-38-43	100.000	574.9	608	0	0
C	10894	WHBR	STA	34	DS		PENSACOLA	FL	D	30-37-35	087-38-50	108.000	415	449	353.0	1.55
C	10894	WHBR	CP	34	DT		PENSACOLA	FL	D	30-37-35	087-38-50	1000.00	415	449	353.0	1.55
C	11906	WPMI-T	LIC	15	TV		MOBILE	AL	D	30-37-35	087-38-50	5000.00	521	554	353.0	1.55
C	10894	WHBR	LIC	33	TV		PENSACOLA	FL	D	30-37-35	087-38-50	3470.00	415	449	353.0	1.55
C	83150	960722	APP	61	TV		MOBILE	AL	N	30-37-38	087-37-31	5000.00	347	378	49.46	2.52
C	17611	WSRE	STA	31	DS		PENSACOLA	FL	D	30-36-40	087-36-27	287.000	549	657	92.43	3.63
C	11906	WPMI-T	LIC	47	DT		MOBILE	AL	D	30-36-40	087-36-27	1000.00	558	590	92.43	3.63
C	17611	WSRE	CP	31	DT		PENSACOLA	FL	D	30-36-40.3	087-36-26.9	1000.00	549	590	92.28	3.63
C	11906	WPMI-T	APP	15	TV		MOBILE	AL	D	30-36-40	087-36-27	5000.00	563	595	92.43	3.63
C	83943	WBPG	LIC	55	TV		GULF SHORES	AL	D	30-36-40.3	087-36-26.8	3750.00	308	340	92.28	3.63
C	60827	WMPV-T	CP	20	DT		MOBILE	AL	D	30-35-18	087-33-16	500.000	436	468	107.1	9.11
C	60827	WMPV-T	LIC	21	TV		MOBILE	AL	D	30-35-18	087-33-16	4370.00	436	468	107.1	9.11
C	60827	WMPV-T	CP	21	TV		MOBILE	AL	D	30-35-18	087-33-16	3083.00	436	468	107.1	9.11
C	41210	WJTC	LIC	45	DT		PENSACOLA	FL	D	30-35-16	087-33-13	1000.00	457	490	107.3	9.21
C	41210	WJTC	LIC	44	TV		PENSACOLA	FL	D	30-35-16	087-33-13	3310.00	457	490	107.3	9.21

TECHNICAL EXHIBIT  
APPLICATION FOR DTV CONSTRUCTION PERMIT  
NEW DTV STATION  
MOBILE, ALABAMA  
CH 18 300 KW (MAX-DA) 574 M

Technical Specifications

Channel	18
Frequency	494-500 MHz
Proposed Site Coordinates	30° 36' 45" North Latitude
(NAD 27)	87° 38' 43" West Longitude
Site Elevation above mean sea level	44.8 m
Average elevation above mean sea level of 8 equally spaced radials, 3-16 kilometers	42.5 m
Overall height of proposed antenna structure	
Above ground	579.7 m
Above mean sea level	624.5 m
Height of antenna radiation center	
Above ground	570.8 m
Above mean sea level	616 m
Above average terrain	574 m
DTV Transmitter	
Rated power output (average)	16.91 kW
Transmission line	Dielectric 562176
Nominal diameter	(6-1/8") 15.6 cm
Length	(1,950 ft) 594.4 m
Efficiency (2.1 dB loss)	61.6%
Antenna	Dielectric TFU-28GTH 6T120
Polarization	Horizontal
Peak Power Gain	28.8
Beam Tilt	1.00°
Main Lobe(s)	110°, 230°, 350° T



Proposed Operation

Transmitter output power (average)	16.91 kW
Transmission line loss	6.49 kW
Antenna input power	10.42 kW
Effective Radiated Power (MAX-DA) (DTV average at main lobe)	300 kW

Federal Communications Commission  
Commission Registration System (CORES)  
CORES Certification Form

I, Marianne C. Trana, certify that the FCC Registration Number (FRN) listed below is true and correct to the best of my knowledge, information and belief.

FCC Registration Number (FRN)

0	0	0	1	8	1	0	6	7	0		
---	---	---	---	---	---	---	---	---	---	--	--

ENTITY NAME

[illegible]